

Bard's Corrected and Revised Objections and Counter-Designations to AngioDynamics' 9/13/2022 Affirmative Designations					
Name of Deponent	Date of Testimony	AngioDynamics' Affirmative Designations	Bard's Objections to Affirmative Designations	Bard's Counter-Designations	Court's Ruling
Tighe, Daniel	October 1, 2019	8:12 -8:14			
Tighe, Daniel	October 1, 2019	10:2 -10:17			
Tighe, Daniel	October 1, 2019	12:5 -12:14			
Tighe, Daniel	October 1, 2019	24:14 -25:24	Bard Obj. to Angio Affirm. 24:14-25:24 602 (speculation)  Designation includes attorney speaking objection (25:23-24)		Sustained as to attorney speaking
Tighe, Daniel	October 1, 2019	34:21 -34:24	Incomplete designation (missing lead-in question from 34:16-20)		Sustained, subject to cure
Tighe, Daniel	October 1, 2019	35:7 -35:8			
Tighe, Daniel	October 1, 2019	35:10 -35:15			
Tighe, Daniel	October 1, 2019	35:18 -35:25			
Tighe, Daniel	October 1, 2019	36:3 -36:16			
Tighe, Daniel	October 1, 2019	38:4 -38:18			
Tighe, Daniel	October 1, 2019	38:19 -38:23			
Tighe, Daniel	October 1, 2019	39:1 -39:9			
Tighe, Daniel	October 1, 2019	39:19 -39:23			
Tighe, Daniel	October 1, 2019	40:1 -40:6			
Tighe, Daniel	October 1, 2019	40:15 -40:20			
Tighe, Daniel	October 1, 2019	43:6 -43:13	Bard_AD_00155417 not on Plaintiff's exhibit list.		Sustained
Tighe, Daniel	October 1, 2019	47:4 -47:16	Bard_AD_00155417 not on Plaintiff's exhibit list.		Sustained
Tighe, Daniel	October 1, 2019	51:5 -53:8	Bard Obj. to Angio Affirm. 51:5-53:18: 801/802 (hearsay), subject to Court's MIL Ruling  P-110: 801/802 - Hearsay (e.g., page 2: "She said that they have . . .")	233:10-20; 233:23; 234:3-5; 234:8-9; 234:13-18	Overruled

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Tighe, Daniel	October 1, 2019	53:9 -54:13	Objection to P-110		Overruled
Tighe, Daniel	October 1, 2019	54:14 -54:21	Bard Obj. to Angio Affirm. 54:14-21 801/802 (hearsay), subject to Court's MIL Ruling; 611 (lacks foundation)  Objection to P-110		Sustained
Tighe, Daniel	October 1, 2019	57:2 -57:10	Bard Obj. to Angio Affirm. 57:2-9 801/802 (hearsay), subject to Court's MIL Ruling; 602 (speculation), incomplete designation (missing question and lead-in question and answer at 56:20-24)  Objection to P-110		Sustained (hearsay)
Tighe, Daniel	October 1, 2019	57:13 -61:1	Bard Obj. to Angio Affirm. 57:13-57:21 801/802 (hearsay) subject to Court's MIL Ruling; 602 (speculation)  Designation includes attorney speaking objection (e.g. 57:13)  Objection to P-110		Sustained
Tighe, Daniel	October 1, 2019	61:4 -62:2	Bard Obj. to Angio Affirm. 61:4-62:2 801/802 (hearsay) subject to Court's MIL Ruling  Objection to P-110		Sustained
Tighe, Daniel	October 1, 2019	62:5 -62:7	Bard Obj. to Angio Affirm. 62:5-7: 602 (speculation)  Objection to P-110		Sustained
Tighe, Daniel	October 1, 2019	62:8 -62:9	Objection to P-110		Sustained

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Tighe, Daniel	October 1, 2019	62:11 -62:11	Objection to P-110		Sustained
Tighe, Daniel	October 1, 2019	67:6 -69:25	Objection to P-110		Sustained
Tighe, Daniel	October 1, 2019	74:21 -74:25			
Tighe, Daniel	October 1, 2019	75:3 -75:7			
Tighe, Daniel	October 1, 2019	75:10 -75:10			
Tighe, Daniel	October 1, 2019	75:21 -76:8	Bard Obj. to Angio Affirm. 75:21-76:8: 801/802 (hearsay), subject to Court's MIL Ruling		Sustained
Tighe, Daniel	October 1, 2019	76:9 -76:14	Designation includes attorney speaking objection (76:14)		
Tighe, Daniel	October 1, 2019	76:16 -76:20			
Tighe, Daniel	October 1, 2019	78:17 -78:24			
Tighe, Daniel	October 1, 2019	79:13 -79:20			
Tighe, Daniel	October 1, 2019	80:3 -81:14	Bard Obj. to Angio Affirm. 80:3-81:14: 801/802 - Hearsay  P-109: 801/802 - Hearsay (e.g., page 1: statements on initial data)	81:15-81:25	Sustained as to 81:1-3 ("I know...")
Tighe, Daniel	October 1, 2019	82:5 -82:24	Bard Obj. to Angio Affirm. 82:5-24 801/802 (hearsay)  Objection to P-109		Sustained
Tighe, Daniel	October 1, 2019	87:17 -87:25	Bard Objection to Affirmative 87:17-25: 403 - More Prejudicial than Probative; 801/802 - Hearsay  P-76: 403 - More Prejudicial than Probative (e.g., "fucking bat shit crazy"); 801/802 - Hearsay (e.g., page one: "I have a large account . . .")		Overruled
Tighe, Daniel	October 1, 2019	87:22 -88:6	Objection to P-76		Overruled

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Tighe, Daniel	October 1, 2019	88:7 -92:11	Bard Objection to Affirmative 88:7-92:11: 403 - More Prejudicial than Probative; 801/802 - Hearsay; Designation includes attorney speaking objection  Objection to P-76		Overruled
Tighe, Daniel	October 1, 2019	92:22 -92:23	P-129: 801/802 - Hearsay (e.g., page 2: "As for UCH . . .")		Overruled
Tighe, Daniel	October 1, 2019	93:2 -99:21	Bard Objection to Affirmative 93:2-99:21 801/802 (hearsay), subject to Court's MIL Ruling, 602 (speculation)  Objection to P-129		Sustained as to 96:6-97-2 (hearsay)
Tighe, Daniel	October 1, 2019	100:6 -100:18	Bard Obj. to Angio Affirm. 100:6-100:18: 602 (speculation), 611 (vague, lacks foundation), 801/802 (hearsay)		Sustained
Tighe, Daniel	October 1, 2019	101:12 -101:23			
Tighe, Daniel	October 1, 2019	118:15 -119:2			
Tighe, Daniel	October 1, 2019	123:3 -123:7			
Tighe, Daniel	October 1, 2019	123:6 -123:20			
Tighe, Daniel	October 1, 2019	124:4 -124:9			
Tighe, Daniel	October 1, 2019	126:6 -126:16			
Tighe, Daniel	October 1, 2019	132:2 -132:20	Bard Obj. to Angio Affirm. 132:2-20 (Exhibit 10) 801/802 (hearsay), subject to Court's MIL Ruling; 401 (relevance)  P-30: 401/402 - Relevance; 801/802 - Hearsay (e.g., page 3, "They are saying very few centrals..."; page 3, "She told Laci this is a three month...")		Overruled

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Tighe, Daniel	October 1, 2019	143:19 -145:3	Bard Obj. to Angio Affirm. 143:19-145:3 (Exhibit 12) 801/802 (hearsay), subject to Court's MIL Ruling  P-177: Hearsay (e.g. recounting conversation with a third party - "she wants something in writing"; "her boss . . . told her to move forward with whatever they need")		Overruled
Tighe, Daniel	October 1, 2019	145:9 -145:19	Bard Obj. to Angio Affirm. 145:9-16 801/802 (hearsay), subject to Court's MIL Ruling; 611 (lacks foundation); 602 (speculation); designation includes attorney speaking objection  Objection to P-177		Overruled
Tighe, Daniel	October 1, 2019	146:1 -146:9	Bard Obj. to Angio Affirm. 146:1-9 801/802 (hearsay), subject to Court's MIL Ruling; 611 (lacks foundation); 602 (speculation)  Objection to P-177		Overruled
Tighe, Daniel	October 1, 2019	146:12 -146:16	Bard Obj. to Angio Affirm. 146:12-16 801/802 (hearsay), subject to Court's MIL Ruling; 611 (lacks foundation); 602 (speculation)  Objection to P-177		Overruled

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Tighe, Daniel	October 1, 2019	146:19 -147:5	Bard Obj. to Angio Affirm. 146:19-147:5 801/802 (hearsay), subject to Court's MIL Ruling; 611 (lacks foundation); 602 (speculation)  Objection to P-177		Overruled
Tighe, Daniel	October 1, 2019	147:10 -147:11	Bard Obj. to Angio Affirm. 147:10-11 801/802 (hearsay), subject to Court's MIL Ruling; 611 (lacks foundation); 602 (speculation); 611 (vague); incomplete designation (missing answer at 147:13)  Objection to P-177		Sustained as to missing answer, subject to cure
Tighe, Daniel	October 1, 2019	147:14 -147:21	Bard Obj. to Angio Affirm. 147:14-21 801/802 (hearsay), subject to Court's MIL Ruling; 611 (lacks foundation); 602 (speculation); 611 (vague)  Objection to P-177		Overruled
Tighe, Daniel	October 1, 2019	149:25 -150:1	Bard Obj. to Angio Affirm. 149:25 - 150:1: 801/802 (hearsay), 611 (lacks foundation), 602 (assumes facts not in evidence)		Sustained
Tighe, Daniel	October 1, 2019	150:4 -150:12	Bard Obj. to Angio Affirm. 150:4 - 150:12: 801/802 (hearsay), 611 (lacks foundation), 602 (assumes facts not in evidence)		Sustained
Tighe, Daniel	October 1, 2019	150:14 -151:7	Bard Obj. to Angio Affirm. 150:14 - 151:7: 801/802 (hearsay), 611 (lacks foundation), 602 (assumes facts not in evidence)  Objection to P-177		Sustained


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Tighe, Daniel	October 1, 2019	156:11 -157:25	Bard Obj. to Angio Affirm. 156:11-157:25 801/802 (hearsay), subject to Court's MIL Ruling  P-176: Hearsay (e.g. "Our physicians want to use the CHG coated PICC lines")		Overruled (inquiry)
Tighe, Daniel	October 1, 2019	163:19 -163:21	Bard Obj. to Angio Affirm. 163:19-163:21 801/802 (hearsay), subject to Court's MIL Ruling; 611 (lacks foundation); 602 (assumes facts not in evidence)  Objection to P-176		Sustained
Tighe, Daniel	October 1, 2019	163:23 -164:2	Bard Obj. to Angio Affirm. 163:23-164:2 801/802 (hearsay), subject to Court's MIL Ruling; 611 (lacks foundation); 602 (assumes facts not in evidence)		Sustained
Tighe, Daniel	October 1, 2019	165:7 -165:16			
Tighe, Daniel	October 1, 2019	179:17 -181:11	Bard Obj. to Angio Affirm. 179:17-181:11 801/802 (hearsay), subject to Court's MIL Ruling; 611 (lacks foundation), 401/402 (relevance)  P-337: 401/402 - Relevance; Foundation; 801/802 Hearsay (e.g., Page 31 ("Stragecially developed relationships in infection control, ICU, education and materials management to build a defensive stragey against physician determined to bring in Arrow.")))		Sustained (401 Relevance and 403 time wasting)

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Tighe, Daniel	October 1, 2019	185:15 -185:25	Bard Obj. to Angio Affirm. 185:15-25 801/802 (hearsay), subject to Court's MIL Ruling; 401/402 (relevance)  P-383: 801/802 - Hearsay (e.g., pg. 4 "evaluations were positive for the customer . . . concern about floppiness of the VN wire") 401/402 - Relevance		Overruled
Tighe, Daniel	October 1, 2019	190:1 -190:16	Objection to P-383		Overruled
Tighe, Daniel	October 1, 2019	190:20 -194:1	Bard Obj. to Angio Affirm. 190:20-194:1 801/802 (hearsay), subject to Court's MIL Ruling, designation includes attorney speaking objection  P-24: 401/402 - Relevance; 801/802 - Hearsay (e.g., page 3, "mentioned that she felt taking multiple print images..."; page 3, "they think having a cap..."; page 4, "Jan mentioned that the budget was tight..."; page 10, "mentioned she thought there was significant value in the education and support...")		Overruled except as to attorney speaking
Tighe, Daniel	October 1, 2019	194:2 -195:24	Bard Obj. to Angio Affirm. 194::2-195:24 801/802 (hearsay), subject to Court's MIL Ruling  Objection to P-24		Overruled



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Tighe, Daniel	October 1, 2019	195:25 -196:23	Bard_AD_00021914 not on Exhibit List.		Sustained as to 195:25-196:1 (attorney objection) and 196:7-23 (not on any party's exhibit list)
Tighe, Daniel	October 1, 2019	204:11 -204:19	Bard Obj. to Angio Affirm. 204:11-19 801/802 (hearsay), subject to Court's MIL Ruling; 611 (lacks foundation)		Sustained (hearsay)
Tighe, Daniel	October 1, 2019	226:19 -227:1			

September 22, 2022

  
Brenda K. Sannes  
Chief U.S. District Judge